

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

PATRICK A. ROSE
Assistant United States Attorney
Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Patrick.Rose@usdoj.gov

Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-VCF

**Unopposed Motion for Extension of
Time**

(Third Request)

The Federal Defendants respectfully move for a 45-day extension of time, from October 5, 2023, to November 20, 2023, to file a response to Plaintiff's Complaint (ECF No. 1). This is the third request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who has no objection to this request for an extension of time.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, the parties continue to assess recent developments at the agency level, and the parties desire additional time for such assessments and related communications. Additionally, there is the prospect of a lapse of

1 congressionally-funded appropriations on September 30, 2023. Lapses of appropriations
2 negatively affect the availability of personnel at the USAO, client agencies, or both to
3 conduct business. This motion is filed in good faith and not for the purposes of undue
4 delay. Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel does
5 not oppose, this extension of time, from October 5, 2023, to November 20, 2023, to file a
6 response to Plaintiff's Complaint.

7 Respectfully submitted this 28th day of September 2023.

8 JASON M. FRIERSON
9 United States Attorney

10 /s/ Patrick A. Rose
11 PATRICK A. ROSE
12 Assistant United States Attorney

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14 **IT IS SO ORDERED**

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16 **UNITED STATES MAGISTRATE JUDGE**

17 **DATED:** 9-29-2023
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